

**Robbins Geller
Rudman & Dowd LLP**

Atlanta
Boca Raton

Chicago
Manhattan

Melville
Nashville

Philadelphia
San Diego

San Francisco
Washington, DC

Mary Blasy
mblasy@rgrdlaw.com

January 25, 2019

VIA EMAIL AND FILING ECF

The Honorable Valerie E. Caproni
Thurgood Marshall Courthouse
40 Foley Square, Room 240
New York, NY 10007
CaproniNYSDCchambers@nysd.uscourts.gov

Re: Gene Samit and John Lantz v. CBS Corporation, et al., No. 1:18-cv-7796

Dear Judge Caproni:

We are Lead Counsel for plaintiffs and represent the Construction Laborers Pension Trust for Southern California, Lead Plaintiff in the above-noted matter. Pursuant to Sections 1.C and 1.D of Your Honor's Individual Rules, we write to respectfully request that the Court so-order the enclosed stipulation, which extends by two weeks the deadline for Lead Plaintiff to file its Consolidated Amended Complaint and otherwise retains the same previously ordered briefing schedule in the event Defendants elect to move to dismiss such complaint. This request is just being made today because it took us a couple of days to obtain the consent of all parties.

The request is necessitated by the persistence of a personal exigency on the part of the counsel for Lead Plaintiff directly responsible for preparing the Amended Consolidated Complaint, and counsel for all Defendants have agreed to the request for a short two week-extension. Other than the Initial Pre-Trial Conference scheduled for April 19, 2019 (with related filing deadlines) set contingent upon Defendants having answered the operative complaint by that deadline, which the parties are hereby asking the Court to reschedule, all other components of the Court's December 14, 2018 scheduling order will remain in full force and effect. Accordingly, Lead Counsel and Lead Plaintiff respectfully request that the Court so-order the enclosed stipulation which, among other things, extends the deadline to file the Amended Consolidated Complaint until February 11, 2019.

Very truly yours,



MARY BLASY

Enclosure

cc: Counsel of Record (via ECF and email w/ encl.)